

Hugh Dunkerley
105 Waldorf
Irvine, CA 92612
310 383 3231
Defendant *Pro Se*

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,
Plaintiff

v.

DEVON D. ARCHER, BEV ANT. COONEY,
HUGH DUNKERLEY, JASON W. GALANIS,
JOHN P. GALANIS, GARY T. HIRST and
MICHELLE A. MORTON,

Defendants.

ECF CASE

CASE NO.: 16-Cv-3505 (WHP)
ANSWER TO COMPLAINT

Defendant HUGH DUNKERLEY, as and for his answer to the Plaintiffs'

Complaint, states as follows:

1. With respect to the allegations contained in paragraphs 1 through 9 of the complaint, I assert my rights under the Fifth Amendment to the United States Constitution and I decline to answer those allegations on the grounds any answer may tend to provide incriminating evidence against me.

2. With respect to the allegations contained in paragraphs 10 through 15 of the complaint, I assert my rights under the Fifth Amendment to the United States Constitution and I decline to answer those allegations on the grounds any answer may tend to provide incriminating evidence against me.

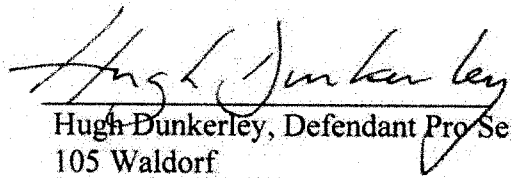
3. With respect to the allegations contained in paragraphs 16 through 22 of the complaint, I assert my rights under the Fifth Amendment to the United States Constitution and I decline to answer those allegations on the grounds any answer may tend to provide incriminating evidence against me.

4. With respect to the allegations contained in paragraphs 23 through 26 of the complaint, I assert my rights under the Fifth Amendment to the United States Constitution and I decline to answer those allegations on the grounds any answer may tend to provide incriminating evidence against me.

5. With respect to the allegations contained in paragraphs 27 through 139 of the complaint, I assert my rights under the Fifth Amendment to the United States Constitution and I decline to answer those allegations on the grounds any answer may tend to provide incriminating evidence against me.

6. With respect to the allegations contained in plaintiff's prayer for relief on pages 41-43 of the complaint, I assert my rights under the Fifth Amendment to the United States Constitution and I decline to answer those allegations on the grounds any answer may tend to provide incriminating evidence against me.

Dated: August 14, 2016
Irvine, Ca


Hugh Dunkerley, Defendant Pro Se
105 Waldorf
Irvine, CA 92612
310 383 3231
hugh@dunkerley.us